

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

Civil Action 3:20-cv-2755-MGL

**JOHN DOE,**

*Plaintiff,*

v.

**MARK KEEL**, in his official capacity as Chief of South Carolina Law Enforcement  
Division,

**SOUTH CAROLINA LAW ENFORCEMENT DIVISION (“SLED”),**

*Defendants.*

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PLAINTIFF’S MOTION FOR EXTENSION OF TIME  
FOR EXPERT DISCLOSURES

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JOHN DOE, by and through undersigned counsel, respectfully requests that the Court grant him an extension of time to file his expert disclosures until December 11, 2020. In support thereof, counsel states as follows:

**Local Rule 7.02:** Counsel for Plaintiff reached out via email to counsel for Defendants on December 4, 2020, regarding this request and has not yet received a response.

1. Counsel for Plaintiff is close to finalizing the involvement of expert witnesses.
2. The Thanksgiving holiday made communication between undersigned counsel and potential experts more difficult.

3. Counsel believes that disclosures can be provided by Friday, December 11, 2020.
4. Under the Court's scheduling order, Defendants have until February 5, 2021, to provide their expert disclosures and thus will not be prejudiced by a short delay in Plaintiff's disclosures.

Respectfully submitted this 7th day of December , 2020.

*s/ Allen Chaney*

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*s/ Shirene Hansotia*

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